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14 September 2004

Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Attention: Marlene Dortch

Subject: Reply Comments to WT Docket No. 01-90, Amendment of Commission Rules Regarding Dedicated Short-Range Communication Services in 5.850-5.925 GHz Band (5.9 GHz Band)

Dear Ms. Dortch:

TransCore, a participating member of the Dedicated Short Range Communications (DSRC) Industry Consortium and standard activities, would like to support the comments submitted by ARINC, John Hopkins University and ITS America. They were responding to the Federal Communications Commission in its Report and Order, FCC 03-324 published in the Federal Register (69 Federal Register 46438) on 03 August 2004.

Specifically, TransCore supports the following concerns from the three submissions:

- Refine Site Registration, including Active Spectrum Interference Management, to allow successful deployments
- Modify the 12 month Registration Requirements to apply Priority Rights at the time of Installation
- Dedicate Channels # 172 & 184 and add a PSOBU category
- Keep Docket WT 01-90 open for further refinement of ASTM E2213

3M requested the elimination of the Class D emission mask which is listed in ASTM Standard E2213. We believe this issue should be addressed and resolved in the ASTM 17.51 working committee. We would like to note that should the Commission choose to remove the Class D mask at this time, the ability for government entities to transmit at greater than 33 dBm EIRP should also be removed to avoid adjacent channel interference.

We support retention of the antenna height correction factor at this time. 3M stated that they plan to install antennas at a height of 8 meters, which would require a reduction in transmit power of 2.5 dB according to the proposed correction factor. We do not find this amount of correction to be overly restrictive in the design of a deployment.

TransCore generally supports the DSRC licensing and service rules and commends the FCC for its leadership to promote robust interoperability of DSRC technology in public safety and private applications.

Respectfully submitted,

TransCore

/s/Jeremy Landt

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